

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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:  
UNITED STATES OF AMERICA,

: Plaintiff,

-v.-

\$5,379,876.94 in United States currency formerly on deposit in Sunflower Bank, N.A. Account 1101996560, held in the name of "OFAC Blocked Account Malofeyev,"

: DECLARATION OF ASSISTANT UNITED STATES  
: ATTORNEY THANE REHN

: 22 Civ. 10148 (JMF)

:

Defendant-*in-rem*. :  
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STATE OF NEW YORK )  
COUNTY OF NEW YORK : ss.:  
SOUTHERN DISTRICT OF NEW YORK )

THANE REHN, under penalty of perjury, declares:

1. I am an Assistant United States Attorney in the Office of Damian Williams, United States Attorney for the Southern District of New York, attorney for the plaintiff herein. I have responsibility for the above-captioned matter, and as such, I am familiar with the facts and circumstances of this case. This Declaration is submitted in support of the Government's application for a Judgment of Forfeiture with respect to the above-captioned Defendant-*in-rem*.

2. On November 20, 2022, the United States commenced an *in-rem* forfeiture action seeking the forfeiture of the Defendant-*in-rem*, by the filing of a Verified Civil Complaint for Forfeiture (the "Verified Complaint"). The Verified Complaint alleged that the Defendant-*in-rem* is subject to forfeiture pursuant to Title 18, United States Code, Section 981(a)(1)(C).

3. Beginning on or about December 3, 2022, and continuing through January 1, 2023, the Government published notice of the Verified Complaint for Forfeiture against the

Defendant-*in-rem*, on the official government internet site, [www.forfeiture.gov](http://www.forfeiture.gov) for at least 30 consecutive days, and proof of such publication was filed with the Clerk of this Court on January 27, 2023 (D.E. 5).

4. As set forth in Rule G(4)(a)(ii) and Rule G(5)(a)(ii), the notice of forfeiture specified the Defendant-*in-rem* and the intent of the United States to forfeit and dispose of the Defendant-*in-rem*, thereby notifying all third parties of their right to file a claim to adjudicate the validity of their alleged legal interest in the Defendant-*in-rem*, within sixty days from the first day of publication of the Notice on the official government internet site.

5. On or about December 20, 2022, the Government sent direct notice of the Verified Complaint by electronic mail to the following:

- i. Giannis Karageorgis
- ii. Giannis Karageorgis  
c/o Cari Stinebower, Esq.
- iii. Konstantin Malofeyev
- iv. Konstantin Malofeyev  
c/o Pavel Kuzmin, Esq.

(the “Noticed Parties”).

6. The Noticed Parties are the only individuals and/or entities known to the Government to have a potential interest in the Defendant-*in-rem*.

7. No claims or answers have been filed or made in this action and no other parties have appeared to contest the action, and the requisite time periods in which to do so, as set forth in Title 18, United States Code, Section 983(a)(4)(A) and Rule G of the Supplement Rules for Admiralty or Maritime Claims and Asset Forfeiture Claims, have expired.

8. Accordingly, the Government respectfully requests that the Court enter the attached proposed Judgment of Forfeiture attached hereto as Exhibit A.

9. There has been no prior application for the relief sought herein.

I declare the foregoing to be true and correct pursuant to Title 28, United States Code, Section 1746.

Dated: New York, New York  
February 2, 2023

  
THANE REHN  
Assistant United States Attorney